

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

LI YING HUA, LI ZHENG ZHE, and XU JING JI,) CASE NO. CV 05-0019
)
)
Plaintiffs,)
)
)
)
vs.)
)
JUNG JIN CORPORATION, a CNMI corporation,)
ASIA ENTERPRISES INC., a CNMI corporation,)
PARK HWA SUN and KIM HANG KWON,)
)
Defendants.)
)

DEPOSITION OF JUNG JIN CORPORATION

Taken at the
Office of Mark B. Hanson
Attorney at Law
First Floor, Macaranas Building
Beach Road, Garapan
Saipan, Mariana Islands 96950

January 24, 2006

APPEARANCES:

1. MARK B. HANSON, ESQ.
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Attorney for Plaintiffs

2. STEPHEN J. NUTTING, ESQ.
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Susupe, Saipan, Mariana Islands 96950

Attorney for Defendants

3. MR. ALEX J. TAE
P.O. Box 502002 CK
Saipan, Mariana Islands 96950

Translator (Korean)

STIPULATIONS: None.

1 BY MR. HANSON: Okay, we're on the record in the deposition of Jung Jin
2 Corporation in the case Li Ying Hua, Li Zheng Zhe, Xu Jing Ji, plaintiffs versus Jung Jin
3 Corporation, Asia Enterprises, Inc., Park Hwa Sun and Kim Hang Kwon, defendants, in
4 case number 050019 currently pending in the United States District Court for the
5 Northern Mariana Islands.

6 My name is Mark Hanson. I am the attorney for the plaintiffs. I'm also the
7 officer for this deposition.

8 Present today is Mr. Kim Hang Kwon in response to a Rule 30(b)(6) notice of
9 deposition of Jung Jin Corporation.

10 The attorney for the defendant is Steve Nutting, who is present, and Mr. Alex Tae
11 is going to be a translator today, neutral translator for the deposition.

12 KIM HANG KWON, having first been duly sworn by Mark B. Hanson, was
13 examined and testified as follows:

14 EXAMINATION BY MR. HANSON:

15 Q. Now, you understand that you are now under oath?

16 A. Yes.

17 Q. Do you need the oath translated to you?

18 A. No, I don't. I'm telling the truth and nothing but the truth.

19 Q. Okay. Now, first off, Mr. Kim, if there's anything you don't understand
20 here today, I want you to ask for clarification.

21 A. Okay.

22 Q. Okay? Now, for the record, today is January 24th, 2006. This deposition
23 is beginning at approximately 2:15 p.m.

1 Now, as you said, you understand that you are under oath?

2 A. Yes.

3 Q. Okay. That means that if you lie here, you could potentially be prosecuted
4 for criminal violations, called perjury. That's why it's important that if you don't
5 understand something, you don't answer. You ask for either me to re-state it or you ask
6 Mr. Tae to translate it again, if you don't understand. Now, Mr. Kim, have you ever been
7 in a deposition before?

8 A. Yes, I have.

9 Q. Were you the deponent in the deposition?

10 A. [Inaudible response]

11 Q. Okay, so you're familiar with what happens in a deposition.

12 A. As it is now.

13 Q. Right. So, you know that we're recording this. We're recording your
14 voice when you talk?

15 A. Yes, I do.

16 Q. So, it's important to respond verbally to everything today because it's
17 being recorded.

18 A. Yes.

19 Q. Okay. We're also videotaping today. Do you understand?

20 A. Yes.

21 Q. And that videotape is being recorded onto a DVD.

22 A. Yes.

23 Q. Now, at the end of this I will provide you with a copy of the sound

1 recording and a DVD of the video recording if you would like, as a courtesy to you.

2 Okay? I'll provide that to your attorney. He can give that to you.

3 Now, just to –

4 A. It's not necessary for me to have it.

5 Q. Okay. Just some preliminary questions. Do you feel okay today?

6 A. Yes. I'm okay.

7 Q. You're not sick or anything?

8 A. No.

9 Q. Have you been drinking at all today?

10 A. Just some water.

11 Q. Just water. But no alcohol?

12 A. No alcohol.

13 Q. Are you under the influence of any medication today?

14 A. No.

15 Q. So, before we begin I just want to let you know if at any time you want to
16 stop, you need to take a break, then you can let me know and we'll stop for as much time
17 as you need. Okay?

18 A. I'm sorry? Okay, I see.

19 Q. Now, Mr. Kim, you're here in response to what I will refer to as a notice
20 under Rule 30(b)(6). Do you understand that? 30(b)(6)?

21 A. [Inaudible response]

22 Q. Okay. What the plaintiffs have done in this case is sent a notice to your
23 attorney that we want to take the deposition of a corporation, and that corporation is Jung

1 Jin Corporation. So, you're here today on behalf of Jung Jin Corporation; is that correct?

2 A. I see.

3 Q. So, you are here today on behalf of Jung Jin; correct?

4 A. No.

5 Q. Okay. Is there somebody that's going to appear today on behalf of Jung
6 Jin Corporation?

7 MR. NUTTING: I believe he was going to be here personally on behalf of
8 himself and if he is the principal of Jung Jin Corporation then he would be the person to
9 testify as to all matters related to Jung Jin -- I'm sorry, to Asia Corporation. No, he
10 doesn't -- he's not involved with Jung Jin Corporation but with Asia Corporation.

11 MR. HANSON: This is the time that we had set for the deposition of Jung Jin
12 Corporation. Is there anybody today that is going to appear on behalf of Jung Jin
13 Corporation?

14 MR. NUTTING: No, Miss Park would be the individual to appear on their
15 behalf, and as we discussed, she's not on island.

16 MR. HANSON: So, Mr. Kim is not being put up as the 30(b)(6) witness for Jung
17 Jin?

18 MR. NUTTING: That's correct.

19 MR. HANSON: Okay. Well, then we will go off record in this deposition until a
20 motion to compel can be made.

21 Does Counsel for the Defense want to make any record.

22 THE WITNESS: While I'm here I want to do the deposition for Asia
23 Corporation.

1 MARK HANSON: We'll pick that up after this. What we'll have to do is stop
2 this deposition and start a new recording for a new deposition. Okay? So it's plaintiff's
3 intent to file a motion to compel. Do the defendants want to make any record?

4 MR. NUTTING: Not at this time.

5 MR. HANSON: So, we'll go off record in this deposition.

6 The time now is approximately 2:24 on January 24th, 2006.

7 We're off the record.

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RULE 30(f)(1) Certification

I, Mark B. Hanson, do hereby certify:

That the foregoing deposition was taken by digital voice recording on the 24th of January, 2006 in the office of Mark B. Hanson and that the deponent was duly sworn by the undersigned Notary Public for the CNMI;

That the foregoing pages are a true and accurate record of the testimony of the deponent made from the examination record made at the time of the deposition and transcribed under my direction and thereafter verified by me to the best of my knowledge and ability;

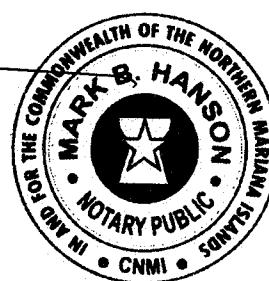
That no Rule 30(e) review was requested before completion of the deposition; and

That the deponent has been notified, this day, of the completion of this transcript, the original of which is hereby filed with the office of Mark B. Hanson.

Sworn this 31st day of March, 2006 in Saipan, Commonwealth of the Northern Mariana Islands.



MARK B. HANSON



MARK B. HANSON
NOTARY PUBLIC
Commonwealth of the Northern Mariana Islands
My Commission Expires: DEC. 8, 2006
P.O.Box 5682 CHRB Saipan, MP 96950